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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CHAD BRAZIL, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

DOLE PACKAGED FOODS, LLC,

Defendant.

Case No. 12-cv-01831 (LHK)

**STIPULATION [and proposed order]
GRANTING EXTENSION OF TIME TO
SUBMIT PROPOSED CLASS NOTICE
PLAN**

Plaintiff and Dole Packaged Foods, LLC by and through their respective counsel of
record, enter into the following stipulation:

WHEREAS, the Court stated in its August 6, 2014 Case Management Order (Dkt. No.
163) that “[b]y August 18, 2014, the parties shall file: (1) an update on the status of Defendant’s
Federal Rule of Civil Procedure 23(f) petition if the Ninth Circuit has not ruled on the petition;
(2) a proposed class notice plan in the Ninth Circuit has denied the petition; or (3) a stipulation
staying the case if the Ninth Circuit has granted the petition;”

WHEREAS, of the time of this filing the Ninth Circuit has not ruled on the 23(f) petition;

WHEREAS, Plaintiff has engaged Hilsoft Notifications to assist in drafting the proposed

1 notice plan. Plaintiff submits Hilsoft is a nationally respected firm that is well experienced in
 2 drafting this type of consumer product notice plan.¹ Hilsoft is drafting both the notice plan as
 3 well as the forms of notice that will ultimately be submitted to the Court. However, due to the
 4 travel schedules of certain Hilsoft personnel over the past several weeks, completion of the first
 5 drafts has been delayed. Plaintiff now asks that he be permitted to submit the proposed notice
 6 plan on or before August 29, 2014;

7 WHEREAS, no other deadlines will be affected by this change;

8 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiff and
 9 Defendant that Plaintiff shall have until August 29, 2014 to file the proposed notice plan.

10 Dated: August 18, 2014.

11 CHARLES BARRETT, P.C.

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 13 /s/ Charles Barrett
 Charles Barrett
 Attorney for Plaintiff
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15 Dated: August 18, 2014.

16 MORRISON & FOERSTER LLP

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 18 /s/ Claudia M. Vetesi
 Claudia M. Vetesi
 Attorney for Defendant
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¹ www.hilsoft.com

ORDER

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: August 19, 2014


Hon. Lucy H. Koh
United States District Court Judge